

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
MANAGEMENT TECHNICAL SERVICES
HEALTH AND SAFETY OFFICE
SITE SAFETY AND HEALTH PLAN

I. DESCRIPTION OF FIELD ACTIVITY

Date: August 27, 2020

Site: Hunters Point Naval Shipyard

Site Phone: none

Location: San Francisco, CA

Superfund: Yes ☒ No ☐

Date of Proposed Investigation: September 2020 through 2021 or longer

SSHP Prepared By: Wayne Praskins, RPM

Purpose/Objective: The purpose of this Site Safety and Health Plan is to describe potential safety issues and precautions associated with the field oversight efforts by EPA personnel at the Hunters Point Naval Shipyard Superfund site. Except for the processing of split soil samples, EPA personnel will primarily be observing Navy activities. (A Navy contractor will collect the sample material and fill the split sample bag provided by EPA personnel.) The Navy is the lead agency for the site.

Background Review: Complete ☒ Preliminary ☐

Background Material Attached: Yes ☐ No ☒

Overall Hazard Summary: Low ☒ High ☐

Unknown ☐ Medium ☐

Route of Exposure: Inhalation ☒ Skin Contact ☒ Ingestion ☒

Map or Sketch Attached: Yes ☒ No ☐ (Figures shows locations where soil will be excavated, scanned, and sampled, and buildings scanned and sampled.)

II. SITE CHARACTERISTICS

A. Facility Description: The Hunters Point Naval Shipyard Superfund Site (HPNS) is located in southeastern San Francisco. The site area is 934 acres in area. The shipyard was used to decontaminate radiologically contaminated ships used in atomic bomb testing in the Pacific (Operation Crossroads), operated as a ship repair facility, and was home to the Naval Radiological Defense Laboratory (NRDL). The NRDL analyzed samples from nuclear weapons tests, conducted studies of the effects of radiation on equipment and living organisms, and produced and used radiological calibration sources. Discarded

radium dials and other radiological objects have been found at the site. Navy shipyard operations ended in 1974 and the site was identified for BRAC closure in 1991.

The Navy expects to transfer portions of the site to the city of San Francisco after remediation work is completed.

B. Status: Active _____ Inactive x Unknown _____

C. History (Include accidents or injuries on-site, complaints from public, previous releases and agency reports): Investigation, decontamination, and remediation at the site has been underway since at least the 1970s. Hundreds and perhaps thousands of workplans and reports have been prepared since investigation work began. There is significant interest in the site from nearby residents, public interest groups, elected officials, and the media, including concerns that site contamination has affected site occupants and nearby residents.

D. Is personal protective equipment required by Facility/Site Management? List equipment and specific areas where required: Generally the Navy requires site visitors to have Level D protection (e.g., steel toed boots, hard hat, safety vest, eye protection). Recently, the Navy put additional requirements into place to address COVID-19 risks (e.g., use of cloth or N95 face masks).

E. Are employees working at the facility/site monitored for exposure to airborne contaminants? If so, describe: Unknown

III. HEALTH AND SAFETY CONSIDERATIONS

A. Hazard Assessment (Toxic effects, TLV, odor threshold, reactivity, stability, flammability, and operations hazards with sampling decontamination, etc.) Attach Material Safety Data Sheets for compounds:

<u>Areas of Concern</u>	<u>Hazard Potential</u> <u>Precautions (High, Med, Low)</u>
<u>Explosive</u>	<u>low</u>

<u>Oxygen Deficient</u> <u>(e.g., confined spaces)</u>	<u>low</u>
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<u>Particulates</u> <u>(dust, mists, asbestos fibers)</u>	<u>low to medium</u>
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Navy workplans included provisions to control dust during excavation and soil handling operations and air monitoring. EPA personnel will monitor Navy dust control actions but are expected to observe from sufficient distance to have minimal exposure.

Toxic Gases/ Vapors

a. General (HNU meter) low

b. Specific: _____

(e.g., sorbent or detector tube)

Skin/Eye Contact: low

Ultraviolet (UV): medium

EPA personnel will be outdoors when at the site. Weather can vary from foggy and cool in the 50's to potentially clear and sunny in the 80s or rarely the 90s. To reduce exposure, EPA personnel are expected to wear hats and long sleeves and long pants.

Heat Stress: low to moderate

Most of the year weather at the site is cool to pleasant. The site is often foggy and windy. During infrequent periods of hot weather, EPA personnel will seek shady areas and ensure proper hydration.

Falling Objects: low

Falls: pits, ponds, low to moderate

The planned work will include excavation of trenches where sanitary sewer pipelines and storm drains were located. EPA personnel will respect safety measures implemented by the Navy contractors to minimize fall hazards. The Navy has a detailed accident prevention plan and site safety and health plan in place.

Bio- Hazards (animals, plants, bacteria, etc) low

Other Hazards _____

Radioactive Hazard: Radionuclide Exposure Rate

Background: The primary radionuclides of concern at the site are: Cs-137, Ra-226, Sr-90. Other radionuclides that may be present include: Am-241, Co-60, Eu-152, Eu-154, Pu-239, Th-232, and U-235. Concentrations are generally expected to be near background levels, although concentrations in the ones of picoCuries per gram (pCi/g) are possible. Concentrations in the tens of pCi/g have been detected in past sampling but are unlikely in the planned sampling effort. The Navy contractor does not expect radiation doses to any of its employees to exceed 100 millirems per year. Any exposure to EPA personnel is expected to be significantly lower than to Navy or Navy contractor personnel.

The Navy will be establishing radiologically controlled areas (RCAs) to limit exposure to site personnel and to control the release of materials, tools, and equipment from radiological areas. Personnel and equipment exiting the boundary of an RCA will be surveyed to ensure that their clothing, equipment, and vehicles do not leave the site with contamination.

B. Monitoring Instruments and Techniques to be Used: (air, environmental personnel)

The Navy will use a variety of radiological scanning and air monitoring equipment. Air monitoring equipment will include real-time dust monitoring and laboratory analysis of filters for Total Suspended Particulates, metals, PM10, asbestos, and radionuclides of concern.

The Navy work plan calls for all personnel entering radiologically controlled areas except untrained, escorted individuals to be assigned an external monitoring device such as a thermoluminescent dosimeter. The work plan also includes provisions for periodic external dose rate measurements before and during intrusive activities to ensure that worker exposures are maintained ALARA.

EPA personnel are not required to use a thermoluminescent dosimeter or real-time radiation monitoring device but may do so at their discretion.

EPA personnel may use a Ludlum survey meter or equivalent to scan split sample bags before shipment to the laboratory.

IV. WORKPLAN INSTRUCTIONS

Hazardous Substance Sampling and Field Investigations

A. Level of protection: A _____ B _____ C _____ D x _____

B. Entry procedures: EPA personnel shall don their PPE before or upon arrival at the site.

C. Field Investigation and Decontamination Procedures:

Decontamination procedures shall consist of removing one's disposable PPE using safe, standard methods and disposing of it in the contractor's PPE waste bin.

Perimeter Establishment: Zones of Contamination Identified?

Public perimeter identified? Y **Map/Sketch Attached?** Y

D. EPA Personnel	Cert. Level	Initial 24/40	Last Resp. fit-test	Medical exam
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		train.		
Dante Rodriguez	ADV	Y	NA	6/20/18
Andrew Bain	ADV	Y	NA	
Mary Aycock	ADV	Y	NA	10/2/18
Sarah Watson	ADV	Y	NA	11/27/19
Wayne Praskins	ADV	Y	NA	

ADV = advanced

E. Work Schedule/Limitations (Heat Stress): No particular limits. If temperatures are unusually high (80's to 90's) more frequent breaks may be appropriate.

F. On Site Communications: All EPA personnel are expected to have cell phones for on- and off-site communications.

G. Decontamination Procedures (contaminated protective clothing, instruments,

equipment, etc): No equipment is expected to require decontamination.

H. COVID-19

In accordance with Interim EPA COVID-19 Health & Safety Guidelines for Field Activities” (July 6, 2020) the following provisions will be followed:

- Comply with Navy contractor Health and Safety Plan which includes requirements that site visitors: 1) receive a COVID-19 orientation when they first visit the site ; 2) fill out a questionnaire at least weekly about recent travel and possible exposure to COVID-19 positive individuals; and 3) receive a daily temperature check and not be allowed onsite if 100.4F or higher;
- Maintain social distancing of six feet whenever possible; exceptions are expected to be infrequent and of short duration;
- Wear N95 or cloth face masks any time social distancing cannot be easily and consistently maintained;
- Minimize use of shared items (clipboard, pen, radiation scanning equipment). Carry hand sanitizer and wash or disinfect hands after touching any shared items, after use of the bathroom, and upon leaving the site for the day;
- Not shake hands and instead use other forms of non-contact greeting;
- Be encouraged to bring their own food and drink.
- Remove any face coverings when leaving the Site and replace with a clean face covering if continued use is appropriate.

VII. EMERGENCY PRECAUTIONS:

A. Nearest Hospital Emergency Room. Note: for remote locations, give directions to hospital and attach map.

Name: Zuckerberg San Francisco General Hospital
Address: 1001 Potrero Ave, SF 94110
Phone: (628) 206-8000

B. Emergency Services (Telephone Numbers)

1. **Fire:** 911, also (415) 553-0123
2. Police: 911
3. Ambulance: 911

C. National Response Center: Toxic Chemicals and Oil Spills: 1-800-424-8802

D. Health and Safety Officer: Jeff Woodlee 415-972-3740

E. Regional Radiation Representative: vacant

VI. Approvals

PLEASE NOTE: The Project Team Leader is responsible for submitting the site-specific post visit summary to the Health and Safety Office within two weeks of completing the trip.

		Signature	Date
Project Team Leader	Wayne Praskins		
Supervisor	John Chesnutt		
Health and Safety Officer	Jeff Woodlee		

